

UNITED STATES DEPARTMENT OF JUSTICE  
OFFICE OF THE UNITED STATES TRUSTEE  
ANDREW R. VARA  
UNITED STATES TRUSTEE, REGIONS 3 & 9  
David Gerardi, Esq.  
Fran B. Steele, Esq.  
Alexandria Nikolinos, Esq.  
One Newark Center, Suite 2100  
Newark, NJ 07102  
Telephone: (973) 645-3014  
[David.Gerardi@usdoj.gov](mailto:David.Gerardi@usdoj.gov)  
[Fran.B.Steele@usdoj.gov](mailto:Fran.B.Steele@usdoj.gov)  
[Alexandria.Nikolinos@usdoj.gov](mailto:Alexandria.Nikolinos@usdoj.gov)

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

In re:	:	Chapter 11
	:	
National Realty Investment	:	Case No. 22-14539 (JKS)
Advisors, LLC, <i>et al.</i> <sup>1</sup>	:	
	:	Hearing Date: October 11, 2022 at 10:00 a.m.
Debtors.	:	
	:	The Honorable John K. Sherwood

**NOTICE OF MOTION OF THE UNITED STATES TRUSTEE AN ORDER  
APPOINTING AN INDEPENDENT FEE EXAMINER AND ESTABLISHING  
PROCEDURES**

**PLEASE TAKE NOTICE** that the United States Trustee, by and through counsel, will move before the Honorable John K. Sherwood, United States Bankruptcy Judge, on **October 11, 2022 at 10:00 a.m.**, or as soon thereafter as counsel can be heard, at the United States Bankruptcy Court, 50 Walnut Street, 3<sup>rd</sup> Floor, Newark, NJ, pursuant to 28 U.S.C. § 586 and 11 U.S.C. §§ 105(a), 328 and 330, for an Order Appointing an Independent Fee Examiner and Establishing Procedures, and for such other and further relief as this Court deems just and appropriate.

---

<sup>1</sup> A complete list of the Debtors in these Chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://omniagentsolutions.com/NRIA>.

**PLEASE TAKE FURTHER NOTICE** that any papers in opposition to the Motion must be filed with the Court and served upon the United States Trustee no later than seven (7) days in advance of the hearing date pursuant to D.N.J. LBR 9013-2(a)(2). If opposing papers are not filed and served within the required time, the Motion shall be decided on the papers pursuant to D.N.J. LBR 9013-3(d) and an Order Appointing an Independent Fee Examiner and Establishing Procedures may be signed and entered in the Court's discretion.

**PLEASE TAKE FURTHER NOTICE** that the United States Trustee shall rely upon the Certification/Declaration and Memorandum of Law submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that pursuant to D.N.J. LBR 9013-3(d), oral argument may only be presented by a party that filed opposition to the Motion.

Respectfully submitted,

ANDREW R. VARA  
UNITED STATES TRUSTEE  
REGIONS 3 & 9

By: /s/ David Gerardi  
David Gerardi  
Trial Attorney

DATED: September 9, 2022